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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
 COMPANY,  
 Debtors.**

Case No. 19-cv-05257-JD

Bankr. Case No. 19-30088-DM

**PARTIES' JOINT STATUS  
 CONFERENCE STATEMENT IN  
 ADVANCE OF OCTOBER 28, 2019  
 STATUS CONFERENCE ON  
 ESTIMATION**

PG&E Corporation and Pacific Gas and Electric Company (together, “**PG&E**” or the “**Debtors**”) and the Official Committee of Tort Claimants (the “**TCC**”) (collectively, the “**Parties**”) hereby submit this Joint Status Conference Statement (“**Joint Statement**”) in advance of the status conference scheduled for October 28, 2019.<sup>1</sup>

As requested by the Court at the October 21, 2019, hearing, the Parties have met and conferred to discuss the substance and distribution process of a proposed Wildfire Claimant Questionnaire. Although the Parties have been able to resolve many issues, the Parties have been unable to fully agree on a form of questionnaire or the process for selecting the sample of responding claimants, as well as the methods for distribution and collection of the responses.

The parties hereby jointly submit the following documents in advance of tomorrow’s hearing regarding the proposed Wildfire Claimant Questionnaire:

1. The Debtors’ proposed questionnaire (**Exhibit A**)
2. The Debtors’ proposed sampling and distribution methodology (**Exhibit B**)
3. The TCC’s proposed questionnaire (**Exhibit C**)
4. A redline of the TCC’s proposed questionnaire against the Debtors’ proposed questionnaire (**Exhibit D**)

The Parties are prepared to discuss these materials with the Court.

## **II. PROPOSED METHODOLOGY**

### **A. TCC’s Proposal**

The Debtors have requested that questionnaire responses be obtained by December 6. Given that time frame, and based on feedback from fire victims’ counsel whose involvement will be necessary in the process to meet this deadline, TCC proposes the following process:

- All questionnaire communications must be through counsel for the fire victims, and victims without representation may not be contacted by PG&E about questionnaires. This is consistent with the TCC’s understanding of the Court’s view. 10/21/19 Hearing Transcript at page 35, lines 2-5.

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<sup>1</sup> Unless separately defined, all capitalized terms are as defined in the Parties’ Joint Status Conference Statement (Dkt. 13).

- Up to 500 represented households may be asked to respond to questionnaires, with each person over 18 years of age living in the home who may have a claim for damages from the Fire completing a questionnaire. With fire victims displaced and often difficult to reach, the TCC understands it would be challenging, if not impossible, for the victims' counsel to facilitate responses to more than 500 household questionnaires before the November 22nd deadline.
- The TCC, with PG&E's input, will select the fire victims who will be requested to respond to questionnaires. The TCC understands that the victims' counsel can identify their clients likely capable of responding before the deadline, and a joint selection of case categories can help assure that those responding are representative of the various fires.
- Once the claims are selected, a list shall be provided to BrownGreer, who will administer the distribution of questionnaires to counsel. Questionnaire responses will ultimately be uploaded electronically to BrownGreer. BrownGreer will compile and report questionnaire response information within five days of the response deadline and complete a secure bulk upload of the completed questionnaires to PG&E. The questionnaire calls for private, personal and confidential information. The questionnaires responses must be treated as Professional Eyes Only under the Protective Order.
- The questionnaire responses may only be used for purposes of the estimation and not in connection with any claims objections or other litigation.

B. Debtors' Proposal

The Debtors' proposed methodology is attached hereto as **Exhibit B**.

1 Dated: October 27, 2019

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“Pursuant to Local Rule 5-1(i)(3), I, Thomas B. Rupp, attest that concurrence in filing this document has been obtained from the other signatories.”

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